

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**THIS DOCUMENT RELATES TO
ALL CASES**

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**CERTAIN SETTLING DEFENDANTS' RESPONSE TO PLAINTIFFS' MOTION TO
LIFT MORATORIUM ON SUBSTANTIVE FILINGS TO PERMIT PLAINTIFFS TO
FILE MOTIONS FOR LEAVE TO AMEND TO ADD DEFENDANTS**

Amneal Pharmaceuticals LLC, Amneal Pharmaceuticals of New York, LLC, and Amneal Pharmaceuticals, Inc. (collectively “Amneal”), Hikma Pharmaceuticals USA Inc., f/k/a West-Ward Pharmaceuticals Corp. (“Hikma”), and Sandoz Inc., Novartis Pharmaceuticals Corporation, Novartis Corporation, Novartis Manufacturing, LLC, Novartis Institutes for Biomedical Research, Novartis AG, and Sandoz International GmbH (collectively “Sandoz and Novartis”) (collectively “Settling Defendants”) respectfully submit this response to the Plaintiffs’ Executive Committee’s (“Plaintiffs”) Motion To Lift Moratorium On Substantive Filings To Permit Plaintiff To File Motions For Leave To Amend To Add Defendants (“Motion”).

On August 31, 2023, Sandoz and its corporate affiliates (including Novartis) reached a conditional settlement agreement with representatives for Political Subdivision Plaintiffs and Tribe Plaintiffs on a resolution of the pending cases against Sandoz and Novartis.

On February 1, 2024, Hikma announced a settlement agreement in principle for a nationwide resolution of all opioids cases that have been filed and that might have been filed against Hikma by states, counties, municipalities, and Native American Tribal Nations in the United States.

On May 3, 2024, Amneal and Plaintiffs announced a settlement in principle for a nationwide resolution to the opioids cases that have been filed and that might have been filed against Amneal by states, counties, municipalities, and Native American Tribal Nations across the United States.

Accordingly, Plaintiffs' Motion is moot as to the Settling Defendants.

Dated: May 6, 2024

Respectfully Submitted,

/s/ Paul J. Cosgrove

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CERTIFICATE OF SERVICE

The undersigned certifies on May 6, 2024, the foregoing was filed using the Court's CM/ECF system and will be served via the Court's CM/ECF filing system on all attorneys of record.

/s/ Paul J. Cosgrove